

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers, <i>Co-Chair</i> Donald A. Migliori, <i>Co-Chair</i> Robert T. Haeefe, <i>Liaison Counsel</i> MOTLEY RICE LLC	Stephen A. Cozen, <i>Co-Chair</i> Sean P. Carter, <i>Co-Chair</i> J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

June 19, 2024

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Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Omar and Fred:

We are writing in response to your letter of June 17, 2024, asking plaintiffs to advise you “what confidential documents with respect to WAMY or WAMY Int’l, if any, plaintiffs have included in their averment or averment responses related to the pending motions filed by the Kingdom of Saudi Arabia which will be the subject of oral argument before Judge Daniels on July 10, 2024.” *First*, plaintiffs object to the characterization of what you have asked, as a document’s prior designation in discovery as “confidential” has no bearing on whether it warrants sealing in the present context. *Second*, as we have articulated to the Court, your request that Plaintiffs identify documents that they anticipate “will be the subject of oral argument . . . on July 10, 2024” improperly seeks privileged information. *Third*, we understood from representations of counsel for Saudi Arabia that they had already consulted with you about the WAMY-related exhibits that are at issue, and that WAMY was considering whether it could meet its sealing burden. We do not understand how WAMY could have done so, consistent with the Court’s instructions on sealing in its March 13, 2023 Order (ECF No. 8923 at 3), if WAMY did not know what documents and information were in issue.

Regardless, Plaintiffs have identified the following WAMY-related exhibits as flagged by Saudi Arabia among the documents they indicated raised potential third-party concerns.

- **Plaintiffs’ Exhibit 347** – Bates # WAMY Intl E000163 to 164; -1535; -12439 to -12444 -- Collection of documents related to Imam Said Regeah: resume, presentation flyer and pay stubs from 4/29/2001 through 8/27/2001.
- **Plaintiffs’ Exhibit 348** - Bates # WAMY Intl E015165 to -15168 – Contract between Dar AL-Hijrah Islamic Center and Sheikh Anwar Aulaqi with attachments.

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- **Plaintiffs' Exhibit 349** - Bates # WAMY SA2444 (English, Arabic and CoT) – Letter from Mana bin Hammad al-Juhani to Abdullah Abdul Mohsen Al Turki regarding employment needs of WAMY offices in Canada and the USA.
- **Plaintiffs' Exhibit 576** - Bates # WAMYSA1249537 (English, Arabic and CoT) – Letter from Dr. Manei bin Hammad Al Juhani, Secretary General of the World Assembly of Muslim Youth to Dr. Khalid bin Mohamed Al Anqari regarding donations provided by Saudi Arabia to WAMY (Deposition Exhibit Wohaibi 320).
- **Plaintiffs' Exhibit 577** - Bates # WAMYSA1248793 (English, Arabic and CoT) – Letter from Dr. Saleh bin Soliman Al Wahibi to Sheikh Saleh bin Abdullah Abdelaziz Al Sheikh regarding a donation in the amount of \$400,000 SR (Deposition Exhibit Wohaibi 321).
- **Plaintiffs' Exhibit 579** - Deposition of Ibrahim Abdullah (Oct. 21, 2019).
- **Plaintiffs' Exhibit 581**- WAMY Intl E015165 to -15168 – Contract between Dar Al-Hijrah Islamic Center and Sheikh Anwar Aulaqi for employment as Imam under the supervision and direction of the Executive Committee of Dar Al-Hirjah (Deposition Exhibit Ibrahim Abdullah 285 (WAMY) (Filed on ECF at ECF No. 3912-43 (2/28/2018).
- **Plaintiffs' Exhibit 655** - Deposition of Saleh al Wohaibi (Oct. 23, 2019).
- **Plaintiffs' Exhibit 656** - WAMYSA1235988 (English, Arabic and CoT) – Letter to WAMY Secretary-General from Abdullah bin Abdul Mohsen Al-Turki (Deposition Exhibit Wohaibi 316).
- **Plaintiffs' Exhibit 657** - WAMYSA1235392 to 1235393 (English, Arabic and CoT) – Letter to Secretary General of the World Assembly of Muslim Youth from Saleh bin Abdul Aziz bin Mohamed Al Al Sheikh (Deposition Exhibit Wohaibi 317).
- **Plaintiffs' Exhibit 658** - WAMYSA1235422 (English, Arabic and CoT) – Letter to WAMY Secretary General from Saleh bin Abdul-Aziz bin Mohammad Al Sheikh (Deposition Exhibit Wohaibi 318).
- **Plaintiffs' Exhibit 659** - WAMYSA1249281 to -1249282 (English, Arabic and CoT) – Letter to Saud bin Abdullah bin Taleb, General Director of the Administrative and Financial Affairs from Assistant Secretary General, Dr. Ibrahim bin Hamad Al Qaeed (Deposition Exhibit Wohaibi 319).

Regards,

MOTLEY RICE LLC

By: /s/ Robert T. Haefele  
ROBERT T. HAEFELE  
MOTLEY RICE LLC

COZEN O'CONNOR

By: /s/ Sean P. Carter  
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